

# **EXHIBIT B**

**Ballard Spahr**  
LLP

TAX IDENTIFICATION NO: 23-0382195

919 North Market Street, 11th Floor  
Wilmington, DE 19801-3034  
Tel 302.252.4465  
Fax 302.252.4466

Paul E. Harner  
1675 Broadway  
New York, NY 10019

May 25, 2022  
Invoice No. 20220505739

Client: Sears Fee Examiner (071820.03)  
Matter: Fee and Expense Review and Reporting (00317415)

FOR PROFESSIONAL SERVICES RENDERED through April 30, 2022

**INVOICE SUMMARY**

|                             |                    |
|-----------------------------|--------------------|
| Professional Fees           | \$37,737.00        |
| <b>Total Invoice Amount</b> | <b>\$37,737.00</b> |

071820.03 - 00317415  
Tobey M. Daluz

May 25, 2022  
Invoice No. 20220505739

**Professional Services**

| Attorney                                  | Date     | Description  | Rate     | Hours | Amount   |
|---|----------|--|----------|-------|----------|
| <b>B160 - Fee/Employment Applications</b> |          |  |          |       |          |
| Vesper,M.A.                               | 04/04/22 | Draft ninth interim fee application  | 470.00   | 0.20  | 94.00    |
| Vesper,M.A.                               | 04/05/22 | Draft ninth interim fee application  | 470.00   | 0.60  | 282.00   |
| Vesper,M.A.                               | 04/06/22 | Draft ninth interim fee application  | 470.00   | 0.30  | 141.00   |
| McClamb,C.D.                              | 04/07/22 | Prepare information for interim fee application                                      | 655.00   | 0.40  | 262.00   |
| Vesper,M.A.                               | 04/07/22 | Draft ninth interim fee application  | 470.00   | 1.20  | 564.00   |
| McClamb,C.D.                              | 04/08/22 | Emails with M. Vesper re: interim fee application                                    | 655.00   | 0.20  | 131.00   |
| Vesper,M.A.                               | 04/08/22 | Draft ninth interim fee application  | 470.00   | 2.10  | 987.00   |
| Daluz,T.M.                                | 04/11/22 | Review/revise interim fee application  | 1,030.00 | 1.00  | 1,030.00 |
| Daluz,T.M.                                | 04/25/22 | Revise interim fee application   | 1,030.00 | 3.50  | 3,605.00 |
| McClamb,C.D.                              | 04/25/22 | Emails with T. Daluz and M. Vesper re: 9th Interim Fee Application                   | 655.00   | 0.20  | 131.00   |
| McClamb,C.D.                              | 04/25/22 | Emails with P. DiDonato re: 9th Interim Fee Application                              | 655.00   | 0.10  | 65.50    |
| McClamb,C.D.                              | 04/25/22 | Review and edit 9th Interim Fee Application  | 655.00   | 1.80  | 1,179.00 |
| Vesper,M.A.                               | 04/25/22 | Review correspondence from T. Daluz and C. McClamb re: ninth interim fee application | 470.00   | 0.10  | 47.00    |
| McClamb,C.D.                              | 04/26/22 | Emails with P. DiDonato re: 9th Interim Fee Application                              | 655.00   | 0.10  | 65.50    |
| Vesper,M.A.                               | 04/28/22 | Draft thirty-fourth joint monthly fee application                                    | 470.00   | 0.60  | 282.00   |
| Vesper,M.A.                               | 04/28/22 | E-mails with P. Harner and T. Daluz re: March invoices                               | 470.00   | 0.10  | 47.00    |
| Daluz,T.M.                                | 04/29/22 | Correspondence with fee examiner re: same  | 1,030.00 | 0.20  | 206.00   |
| Daluz,T.M.                                | 04/29/22 | Attend to monthly fee application  | 1,030.00 | 0.50  | 515.00   |

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| Attorney                                | Date     | Description   | Rate     | Hours        | Amount          |
|---|----------|---|----------|--------------|-----------------|
| <b>Total B160</b>                       |          |   |          | <b>13.20</b> | <b>9,634.00</b> |
| <b>B170 - Fee/Employment Objections</b> |          |   |          |              |                 |
| Daluz,T.M.                              | 04/01/22 | Review docket for recent pleadings                  | 1,030.00 | 0.20         | 206.00          |
| McClamb,C.D.                            | 04/06/22 | Review status of preliminary reports and fee review | 655.00   | 2.00         | 1,310.00        |
| McClamb,C.D.                            | 04/07/22 | Review filed Herrick interim fee application        | 655.00   | 2.80         | 1,834.00        |
| McClamb,C.D.                            | 04/11/22 | Review filed Herrick interim fee application        | 655.00   | 4.50         | 2,947.50        |
| McClamb,C.D.                            | 04/12/22 | Emails with K. Neitzel and C. Pollard re: fee data  | 655.00   | 0.10         | 65.50           |
| McClamb,C.D.                            | 04/12/22 | Review filed Herrick interim fee application        | 655.00   | 4.50         | 2,947.50        |
| McClamb,C.D.                            | 04/13/22 | Review filed Herrick interim fee application        | 655.00   | 4.00         | 2,620.00        |
| McClamb,C.D.                            | 04/14/22 | Review filed Herrick interim fee application        | 655.00   | 2.00         | 1,310.00        |
| Daluz,T.M.                              | 04/15/22 | Review Weil interim fee application                 | 1,030.00 | 0.50         | 515.00          |
| Daluz,T.M.                              | 04/15/22 | Review Akin's interim fee application               | 1,030.00 | 0.50         | 515.00          |
| Daluz,T.M.                              | 04/15/22 | Review Herrick monthly fee application              | 1,030.00 | 0.20         | 206.00          |
| Daluz,T.M.                              | 04/15/22 | Review Kroll interim fee application                | 1,030.00 | 0.30         | 309.00          |
| Daluz,T.M.                              | 04/15/22 | Review FTI's interim fee application                | 1,030.00 | 0.50         | 515.00          |
| Daluz,T.M.                              | 04/15/22 | Review Kroll monthly fee application                | 1,030.00 | 0.20         | 206.00          |
| Daluz,T.M.                              | 04/15/22 | Review docket re: recent pleadings                  | 1,030.00 | 0.30         | 309.00          |
| Daluz,T.M.                              | 04/15/22 | Review Herrick interim fee application              | 1,030.00 | 0.30         | 309.00          |
| Daluz,T.M.                              | 04/15/22 | Review MIII monthly fee application                 | 1,030.00 | 0.20         | 206.00          |
| McClamb,C.D.                            | 04/15/22 | Review filed Herrick interim fee application        | 655.00   | 4.00         | 2,620.00        |
| McClamb,C.D.                            | 04/18/22 | Review filed Herrick interim fee application        | 655.00   | 2.00         | 1,310.00        |

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| Attorney          | Date     | Description  | Rate     | Hours        | Amount             |
|-------------------|----------|--|----------|--------------|--------------------|
| McClamb,C.D.      | 04/20/22 | Review status of preliminary reports and fee review                                    | 655.00   | 2.00         | 1,310.00           |
| McClamb,C.D.      | 04/21/22 | Review Herrick preliminary report and exhibits   | 655.00   | 3.00         | 1,965.00           |
| McClamb,C.D.      | 04/21/22 | Review FTI preliminary report and exhibits   | 655.00   | 3.00         | 1,965.00           |
| Daluz,T.M.        | 04/22/22 | Correspondence with fee examiner re: same  | 1,030.00 | 0.20         | 206.00             |
| Daluz,T.M.        | 04/22/22 | Review motion for litigation funding   | 1,030.00 | 0.20         | 206.00             |
| Daluz,T.M.        | 04/22/22 | Analyze impact on plan effective date  | 1,030.00 | 0.20         | 206.00             |
| Daluz,T.M.        | 04/26/22 | Review docket re: recent filings   | 1,030.00 | 0.20         | 206.00             |
| Daluz,T.M.        | 04/26/22 | Correspondence with P. Harner re: strategy   | 1,030.00 | 0.20         | 206.00             |
| Daluz,T.M.        | 04/26/22 | Review interim fee app notice  | 1,030.00 | 0.10         | 103.00             |
| McClamb,C.D.      | 04/27/22 | Review fee review status   | 655.00   | 1.50         | 982.50             |
| Daluz,T.M.        | 04/29/22 | Review docket re recent filings  | 1,030.00 | 0.10         | 103.00             |
| Daluz,T.M.        | 04/29/22 | Review Kroll monthly fee application   | 1,030.00 | 0.20         | 206.00             |
| McClamb,C.D.      | 04/29/22 | Emails with P. Harner, T. Daluz and M. Vesper re: interim fee hearing                  | 655.00   | 0.20         | 131.00             |
| Vesper,M.A.       | 04/29/22 | E-mails from P. Harner, T. Daluz, and C. McClamb re: invoice request and hearing dates | 470.00   | 0.10         | 47.00              |
| <b>Total B170</b> |          |  |          | <b>40.30</b> | <b>28,103.00</b>   |
| <b>Total Fees</b> |          |  |          | <b>53.50</b> | <b>\$37,737.00</b> |

### Summary of Professional Fees

| Attorney          | Billed Hours | Billed Rate | Billed Amount      |
|-------------------|--------------|-------------|--------------------|
| Daluz,T.M.        | 9.80         | 1,030.00    | 10,094.00          |
| McClamb,C.D.      | 38.40        | 655.00      | 25,152.00          |
| Vesper,M.A.       | 5.30         | 470.00      | 2,491.00           |
| <b>Total Fees</b> | <b>53.50</b> |             | <b>\$37,737.00</b> |

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## REMITTANCE ADVICE

|                             |                    |
|-----------------------------|--------------------|
| Professional Fees           | \$37,737.00        |
| <b>Total Invoice Amount</b> | <b>\$37,737.00</b> |

For billing inquiries please send an email to [CB@ballardspahr.com](mailto:CB@ballardspahr.com)

Our Preferred Method for payment is ACH or Wire Transfer  
<https://ww2.payerexpress.com/ebp/BallardSpahr/Login/Index>

### For Payment by US mail:

Ballard Spahr LLP  
P O Box 825470  
Philadelphia, PA 19182 5470  
Tel 302.252.4465

### ACH and Wire Payment Instructions

Bank: PNC Bank, NA  
1600 Market Street, Philadelphia, PA 19103  
ABA No.: 031 0000 53  
Account No.: 85-3131-7345  
Account Name: Ballard Spahr LLP

Due and Payable Within 30 Days